IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS MCALLEN DIVISION

JANE DOE,	§	
	§	
Plaintiff,	§	
	§	
V.	§	CA NO. 7:19-CV-00309
	§	
	§	
	§	
EDINBURG CONSOLIDATED	§	
INDEPENDENT SCHOOL DISTRICT,	§	
	§	
Defendant.	§	

PLAINTIFF'S MOTION TO APPEAR BY TELEPHONE OR VIDEOCONFERENCE FOR MOTION TO COMPEL HEARING

The Court has scheduled the Motion to Compel Hearing for June 25, 2020 at 4:00 p.m. in McAllen, Texas. Plaintiff's counsel resides in Houston, Texas.

This Court's Special Order entered on June 1, 2020 and in effect until July 3, 2020 states the following:

"Judges in their individual discretion may decide not to hold bench trials, in-person hearings, sentencing proceedings, scheduling conferences, and other court proceedings. Counsel may seek relief by appropriate requests or motions. If any hearings are held, the use of telephone or video conferencing in these proceedings is encouraged when feasible, deemed appropriate by the presiding judge, and permitted by legal and technology constraints"

See Exhibit A, Special Order.

Due to the COVID-19 situation currently affecting Houston, Texas and other areas of the country and pursuant to this Court's Special Order, Plaintiff's counsel respectfully requests permission to appear at and participate in the Motion to Compel Hearing by telephone or video conference in order to safeguard the health and safety of Plaintiff's counsel and other participants.

Respectfully submitted,

THE BUZBEE LAW FIRM

By: <u>/s/ Anthony G. Buzbee</u>

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7.1(D), I hereby aver that on June 19, 2020, I conferred with Defense counsel via email regarding the foregoing motion and Defense counsel stated he is unopposed.

/s/ Cornelia Brandfield-Harvey
Cornelia Brandfield-Harvey

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this document has been duly served on all counsel of record in accordance with the Federal Rules of Civil Procedure on June 19, 2020.

<u>/s/ Cornelia Brandfield-Harvey</u> Cornelia Brandfield-Harvey